

Commonwealth of Kentucky
Division for Air Quality
DRAFT PERMIT STATEMENT OF BASIS

DRAFT CONDITIONAL MAJOR PERMIT NO. F-06-027

AKEBONO-AMTEC BRAKE L.L.C

SPRINGFIELD KY.

MAY 22, 2006

RITA ARGUELLO, REVIEWER

PLANT I.D. # 021-229-00019

APPLICATION LOG # F999

AI# 34345

GENERAL SOURCE DESCRIPTION:

Akebono-AMTEC Brake is an automotive manufacturing facility, which was established in 2002 and is located in Springfield, Kentucky. Currently employees are approx. 250 team members. Akebono-AMTEC manufactures original and aftermarket disc brake pads. The source began operation in June 2002.

To make the brake pads, friction material is mixed, blended and hot molded. The formed pad is attached to a metal pressure plate. Pads are cured in ovens using natural gas burners. After curing, the disc brake pads are sent through a grinding/slitting and scorching process. A powder coating is then applied to the steel parts of the disc brake assembly and cured in an electric oven. The hot mold presses are the plant wide limiting step in the process at a rate of 2,548 pads/hour or 22,320,000 pads per year, using 7822.4 tons per year of friction material. The disc brake pads are marked with ink jet printer and packaged for shipment.

In 2006, AMTEC added the Remanufacturing Caliper process, which is also distributed to a number of aftermarket distributors. Akebono-AMTEC self imposed limitation on PTE to prelude Title V Permit applicability for Particulate Matter.

INDIVIDUAL UNIT, OPERATION OR ACTIVITY EMISSION AND OPERATING CAPS:

01(05) Mix Blend 1

02(05) Mix Blend 2

03(05) Surface Treatment Adhesive Booth

04(06) OE Line 1 Slitter/Grinder #1A

05(06) OE Line 1 Slitter/Grinder #1B

06(06) AM Line 1 Slitter/Grinder 1

07(06) AM Line 1 Slitter/Grinder 2

08(06) AM Line 1 Slitter/Grinder 3

09(07) AM Line 2 Slitter/Grinder

10(32) Ink Jet printing

COMMENTS:

EP (01 to 09) 05, 06 and 07

AMTEC shall submit a notification and get an approval from the Division if the friction material vendor supplier or chemical composition changes prior to usage in the operation line.

Construction: All equipment was installed on 02/01/2002.

EP (10) 32

This emission is VOC and is greater than 5 tons per year. Printer was installed on 03/01/2006

EMISSION AND OPERATING CAPS:**Applicable Regulation:**

401 KAR 52:030 Federal-enforceable permits for nonmajor sources.

401 KAR 59:010 New process operations.

Operation Limitations:

Particulate Matter emissions shall not to exceed 90 tons per year to prelude applicability of Title V permitting.

Control and Efficiency:

Baghouses. The efficiency is assumed to be 99%, according to Akebono-Amtec Brake information.

Monitoring:

If visible emissions are seen, the permittee shall determine the opacity emission by Reference Method 9, initiate an inspection of the control equipment, and make any necessary repairs.

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.